

## ***Fighting Against Forced Labour and Child Labour in Supply Chains Act***

### **Annual Report**

#### **Introduction**

This report by Aris Mining Corporation (“**Aris Mining**”) is prepared for the purposes of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Canada) (the “**Act**”) for its financial year ended December 31, 2023.

Aris Mining sells gold and silver in doré form produced in Colombia by its subsidiaries, to refiners located offshore. This report provides an overview of the steps taken by Aris Mining in its previous financial year to prevent or reduce the risk of forced labour or child labour in its activities or supply chain.

#### **Structure, activities and supply chains**

##### *Structure*

Aris Mining is a corporation headquartered in Vancouver, B.C. Its common shares are listed and posted for trading on both the Toronto Stock Exchange under the trading symbol “ARIS” and on the NYSE American under the trading symbol “ARMN”.

Aris Mining currently has 15 employees, including the executive team, all of legal working age. The Company’s employees primarily function in corporate, legal finance, corporate development or investor relations capacities.

##### *Activities*

Aris Mining sells gold and silver doré to offshore refiners. The gold and silver sold is produced at the Segovia and Marmato mines by two of its subsidiaries: Aris Mining Segovia and Aris Mining Marmato SAS (collectively, the “**Operating Subsidiaries**”), which are Colombian companies that produce gold and silver in doré form. For the year ended December 31, 2023 Aris Mining purchased from its Operating Subsidiaries and sold to offshore refiners, 224,509 ounces of gold and 239,830 ounces of silver.

Aris Mining also provides the management services (i.e. finance, accounting, legal, corporate development, investor relations, etc.) required to support the Aris Mining enterprise.

##### *Supply Chains*

The Operating Subsidiaries are Aris Mining’s direct suppliers of the gold and silver doré that Aris Mining sells. The Operating Subsidiaries’ supply chains are comprised of the following categories and number of suppliers:

<b>CATEGORY</b>	<b>SUPPLIERS</b>
Admin equipment	1
Admin services	367
Audit services	5
Camp services	203
Construction services	151
Consulting services	266
Consumables	367
Insurance	24
IT services	148
Land acquisition	43

Machinery & Equipment	259
Memberships	28
Minor services	5
Operational rental	18
Operational services	194
Public utilities	15
Rentals	69
Spare parts	63
Training	56
<b>Total general</b>	<b>2282</b>

Of the suppliers listed above, 887 provide supplies directly to Aris Mining Marmato, 1148 directly to Aris Mining Segovia and 247 to both Aris Mining Segovia and Aris Mining Marmato.

The Operating Subsidiaries and their Colombian suppliers are subject to Colombian legislation which has embedded in it explicit prohibitions on forced and child labour. Examples of such legislation related to forced and child labour include the Substantive Labour Code, Childhood and Adolescence Code, Law 1098 of 2006.

Aris Mining's other supply chains are corporate in nature (i.e. professional services, office administration and supplies, Information Technology, food and beverage providers, etc.) with direct suppliers domiciled in Canada.

#### **Policies and due diligence processes in relation to forced labour and child labour**

Aris Mining has a Supplier Code of Conduct that is publicly available on Aris Mining's website, to which each of its suppliers must read, understand and agree and which is also used by its subsidiaries with their suppliers. The Supplier Code of Conduct specifically prohibits suppliers to Aris Mining and its subsidiaries from using forced labour and child labour.

The Operating Subsidiaries have built contractual clauses into their standard form contracts and purchase orders with suppliers that have the effect of incorporating the following policies of both Aris Mining and the Operating Subsidiaries that address the prohibition and prevention of forced and child labour:

- Supplier Code of Conduct;
- Business Conduct & Ethics Policy;
- Occupational Health & Safety Policy;
- LAFT Risk Prevention Policy and SAGRILAFT Manual; and
- Transparency and Business Ethics Program Compliance Policy and PTEE Handbook.

Aris Mining and its Operating Subsidiaries conduct the following due diligence exercises in relation to forced labour and child labour:

- embedding responsible business conduct into policies and management systems, including:
  - prior to contracting with suppliers or the contract mining partners ("**CMs**"), the Operating Subsidiaries conduct court searches in Colombia to identify whether they have been found guilty of offences involving forced or child labour;

- the Operating Subsidiaries require each of their contractors, including the CMPs, to provide a list of their employees that will be working in the Operating Subsidiaries' operations, together with their date of birth and other demographic information to confirm children are not being employed to perform work at our operations.
- each year Aris Mining and its Operating Subsidiaries conduct governance training for all of their employees which governance training includes a detailed review of the contents of the Supplier Code of Conduct together with training on how it should be used and expectations regarding compliance with its terms.
- Aris Mining and its Operating Subsidiaries review their governance policies on an annual basis to confirm their relevancy and that they are up to date in light of emerging and evolving risks in the Operating Subsidiaries' operations, supply chain and other business relationships.

Aris Mining also has a very accessible Whistleblower platform that is available in English and Spanish languages. The Whistleblower platform is available to Aris Mining, its employees and suppliers, and its Operating Subsidiaries' employees, contractors and suppliers. The Whistleblower platform can be used for reporting instances of forced or child labour. Additionally, the Operating Subsidiaries have an in-country grievance line set up which can also be used for reporting such matters.

**Parts of business and supply chains that carry a risk of forced labour or child labour being used and the steps taken to assess and manage that risk**

Aris Mining has not identified any parts of its activities and direct corporate supply chains that carry a risk of forced labour or child labour being used.

Aris Mining has started the process of identifying risks at the Operating Subsidiary level by internally conducting assessments of risk in connection with the Operating Subsidiaries' internal workforce and their CMPs, which CMPs form part of the Operating Subsidiaries' direct supply chain, and therefore Aris Mining's indirect supply chain. However, there are still gaps in the assessments. The risks identified relate to the Operating Subsidiaries' direct supply chains as a result of: (a) operating in the mining industry; (b) the location of the Operating Subsidiaries' mining operations; and (c) the use of CMPs as well as other outsourced, contracted and subcontracted labour in the Operating Subsidiaries' mining operations. No incidents of forced or child labour at the Operating Subsidiaries' operations or supply chains have been identified to date.

The Operating Subsidiaries audit the CMPs and their business practices on a regular basis (monthly by the Operating Subsidiaries' internal work force and quarterly by an independent third party) for the absence of forced and child labour. Further, the Operating Subsidiaries have strict controls in place at the mine gate to monitor who enters the operations and for what purpose, which acts as a control to confirm children are not being used by our contractors and subcontractors at the Operating Subsidiaries' operations. Robust CCTV Systems are in place throughout the Operating Subsidiaries' operations, including where the CMPs operate. Footage is monitored by the security team 24 hours per day for conduct contrary to the policies of the Operating Subsidiaries. Finally, daily visits are made by the Operating Subsidiaries' internal workforce to the areas of the Operating Subsidiaries' operations that are operated by CMPs, contractors and subcontractors, for other monitoring purposes which provides the opportunity for observations to be made as to whether child labour and or forced labour is being utilized by the CMPs.

Additionally, information is gathered from potential hires during the recruitment process to confirm they are not being hired under duress and further internal controls are maintained to confirm that all workers are recruited voluntarily.

## **Remediation Measures**

No incidences of forced labour or child labour have been identified by Aris Mining. Since no incidents have been identified, no measures have been taken to remediate forced or child labour or loss of income to affected parties. In the event instances of forced or child labour were to be identified, Aris Mining would take steps to remediate such occurrences.

## **Training provided to employees on forced labour and child labour**

Aris Mining and its Operating Subsidiaries conduct mandatory training for all employee on forced labour and child labour as part of the onboarding process and on a yearly refresher basis thereafter. The training includes an introduction to the Company's policies, including Health and Safety, Business Code of Conduct and Ethics, the Supplier Code of Conduct and whistleblower and grievance mechanisms available. The training includes information regarding Aris Mining's and the Operating Subsidiaries' blanket prohibition on forced and child labour.

Training is conducted by Aris Mining's General Counsel for Aris Mining's employees and the senior leaders of the Operating Subsidiaries, via in-person, detailed review of the policies. The training provides opportunities for questions and feedback during the training sessions. The training is filmed and training programs and videos are developed in the Spanish language and delivered to the rest of the employees at the Operating Subsidiary level.

## **Assessing effectiveness in ensuring that forced labour and child labour are not being used in business and supply chains**

Aris Mining assesses its effectiveness in ensuring that forced labour and child labour are not being used in its Operating Subsidiaries' direct supply chains through regular audits, as described above, of its CMPs and other contractors and subcontractors together with controlled entry and exit to the operations.

## **Approval and Attestation**

This report was approved by Aris Mining Corporation's Board of Directors on May 14, 2024 pursuant to subsection 11(4)(a) and constitutes Aris Mining Corporation's report for the financial year ending December 31, 2023.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

## **ARIS MINING CORPORATION**

*/s/ Richard Thomas*

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Richard Thomas, Chief Operating Officer, having authority to bind Aris Mining Corporation

*On behalf of the Board of Directors of Aris Mining Corporation*

*/s/ Neil Woodyer*

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Neil Woodyer, Chief Executive Officer and a Director